



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NEW YORK 10007

FELIX DE JESUS
Assistant Corporation Counsel
felixdej@law.nyc.gov
Phone: (212) 356-2377
Fax: (212) 356-1148

February 22, 2023

VIA ECF

Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, N.Y. 10007

Re: Dashaun Outlaw v. City of New York et. al., 22 Civ. 9288 (PAE)

Your Honor:

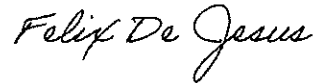
I am an Assistant Corporation Counsel in the Office of Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendant City of New York ("City") in the above-referenced action. Defendant City writes to respectfully request that the Court stay the instant matter until May 8th, 2023 because the undersigned has been selected for jury duty and enlarge Defendant City's time, from February 22, 2023 until May 19, 2023, for it to answer or otherwise respond to the Complaint. Plaintiff's counsel consents to these requests.

By way of background, on October 29, 2022, plaintiff commenced this action pursuant to 42 U.S.C. § 1983 by filing the Complaint alleging claims for false arrest, excessive force, failure to intervene, and illegal search of plaintiff's apartment in violation of the Fourth Amendment. *See* Civil Docket ¶¶ 1. Plaintiff alleges that, on December 31, 2021, his home was illegally searched by a group of at least ten NYPD officers, and that plaintiff was violently forced to the floor and handcuffed behind his back for approximately 20 to 30 minutes.

On February 9, 2023, the undersigned was selected for grand jury duty and, upon information and belief, will be engaged for three months – from February 14th, 2023 to May 5th, 2023. I am expected to be in Court every day during this time period, during the majority of the work day on most days, and will have limited access to my email.

As such, Defendant City respectfully requests that the Court stay the instant matter until May 8th, 2023¹ and enlarge Defendant City's time, from February 22, 2023 until May 19, 2023, for it to answer or otherwise respond to the Complaint. Thank you for your consideration herein.

Respectfully submitted,



Felix De Jesus
Assistant Corporation Counsel
Special Federal Litigation Division

cc: VIA ECF
All attorneys to be Noticed

Granted. SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge
February 23, 2023

¹ Similar stay requests have been granted in the matters of *Ramsey Smith v. The City of New York*, et. al., 21-CV-4157 (HG) (CLP), *Douglas McCallum v. The City of New York*, et. al., 22-CV-81 (PAE) (RWL), and *Rahul Sharma v. The City of New York*, et. al., 21-CV-10892 (ER) (BCM).